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CHERYL MURRAY,

Plaintiff,

vs.

CVS PHARMACY INC,
NEW JERSEY CVS PHARMACY LLC,
ZBS REALTY, LLC c/o ROBERT
LEBOVICS, "JOHN DOES 1-5", and
"ABC COMPANIES 1-5",
(both being fictitious designations),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

DOCKET NO.: BER-L-

CIVIL ACTION

COMPLAINT and JURY DEMAND

Plaintiff, Cheryl Murray, residing at 640 American Legion Dr Apt G, in Township of Teaneck, County of Bergen, State of New Jersey, by way of Complaint against the Defendants, says:

FIRST COUNT

1. On or about September 09, 2021, Plaintiff, Cheryl Murray, was lawfully upon the premises of CVS, located at 540 Cedar Ln, in the Township of Teaneck, County of Bergen, and State of NJ.

2. At the aforesaid time and place, the premises was owned, operated, maintained and/or controlled, as owner, landlord, lessee and/or lessor by Defendants, CVS PHARMACY INC, NEW JERSEY CVS PHARMACY LLC, ZBS REALTY, LLC c/o ROBERT LEBOVICS, "JOHN

DOES 1-5” and/or “ABC CORPORATIONS 1-5”, (fictitious name for individuals whether individually, partnerships or corporations who may be responsible).

3. At the aforesaid time and place, Defendants, CVS PHARMACY INC, NEW JERSEY CVS PHARMACY LLC, ZBS REALTY, LLC c/o ROBERT LEBOVICS, “JOHN DOES 1-5” and/or “ABC CORPORATIONS 1-5”, (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), through its agents, servants, and/or employees had a duty to Plaintiff and persons such as Plaintiff, to keep and maintain the premises in a safe and proper condition and free and clear of any and all hazardous and dangerous conditions and disrepairs which would endanger the safety of Plaintiff and person such as Plaintiff.

4. At the aforesaid time and place, Defendants so negligently and carelessly owned, operated, maintained and/or controlled the subject premises in such a way so as to cause Plaintiff, Cheryl Murray, to become injured due to the presence of a hazardous and dangerous condition on such premises.

5. Defendants above disregarded its duty aforesaid and negligently and carelessly allowed its premises to be improperly, dangerously and palpably unreasonably maintained and to remain in an unsafe and dangerous condition in allowing said hazardous and dangerous condition to exist on its premises, all of which Defendants had due notice or by reasonable inspection thereof, would have had due notice.

6. That at all times hereinafter mentioned, the said Defendants had actual notice and/or constructive notice of said hazardous and dangerous condition and/or by reasonable inspection thereof, would have had due notice of the hazardous and dangerous condition existing.

7. As a result of the aforesaid carelessness and negligence of Defendant, Plaintiff suffered severe and permanent injuries; was disabled and disfigured; has suffered and will continue to suffer great pain and torment, both mental and physical.

8. As a further result of Defendants' aforesaid negligence and the injuries thereby caused to Plaintiff, Plaintiff has been and will be in the future compelled to spend great and diverse sums of money for medical aid and treatment, and has been and will be prevented from attending to the usual occupation, duties, activities and business.

WHEREFORE, Plaintiff, Cheryl Murray, demands judgment against Defendants, CVS PHARMACY INC, NEW JERSEY CVS PHARMACY LLC, ZBS REALTY, LLC c/o ROBERT LEBOVICS, "JOHN DOES 1-5" and/or "ABC CORPORATIONS 1-5", (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), for damages, together with interest and costs of suit.

SECOND COUNT

1. Plaintiff repeats and allegations of the First Count of the Complaint as if set forth at length herein.

2. Plaintiff reserves the right to amend the Complaint to substitute the names of the actual business entity or individual for the fictitious name "JOHN DOES 1-5" and/or "ABC CORPORATIONS 1-5", (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), should it be determined that other persons or entities are responsible for the condition which caused the incident complained of.

WHEREFORE, Plaintiff, Cheryl Murray, demands judgment against Defendants, CVS PHARMACY INC, NEW JERSEY CVS PHARMACY LLC, ZBS REALTY, LLC c/o ROBERT LEBOVICS, "JOHN DOES 1-5" and/or "ABC CORPORATIONS 1-5", (fictitious names for individuals whether individually, partnerships or corporations who may be responsible), for damages, together with interest and costs of suit.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

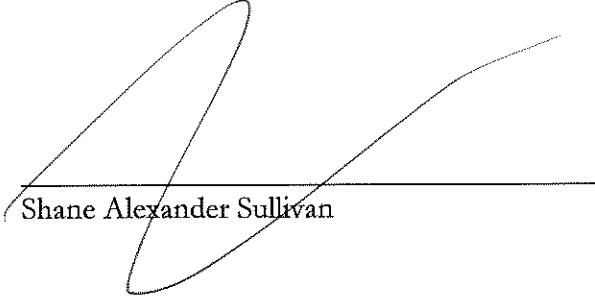
DESIGNATION of TRIAL COUNSEL

Pursuant of Rule 4:5-1(c), Shane Alexander Sullivan, Esq., is hereby designated as Trial Counsel.

CERTIFICATION

I hereby certify that this matter is not the subject of any other action pending in any court or arbitration proceeding, that no such other action or arbitration proceeding is contemplated by this Plaintiff, and that there are no other parties, whom, to the knowledge of Plaintiff(s)' counsel, should be joined in this action.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Shane Alexander Sullivan

Date: February 22, 2022

Civil Case Information Statement

Case Details: BERGEN | Civil Part Docket# L-001518-22

Case Caption: MURRAY CHERYL VS CVS PHARMACY
INC

Case Initiation Date: 03/15/2022

Attorney Name: SHANE ALEXANDER SULLIVAN

Firm Name: JAE LEE LAW PC

Address: 2050 CENTER AVE STE 120
FORT LEE NJ 07024

Phone: 2013463800

Name of Party: PLAINTIFF : Murray, Cheryl

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: Cheryl Murray? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

03/15/2022
Dated

/s/ SHANE ALEXANDER SULLIVAN
Signed